

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION AT GREENEVILLE**

|                                 |   |                                   |
|---------------------------------|---|-----------------------------------|
| <b>In re:</b>                   | ) |                                   |
|                                 | ) |                                   |
| <b>JACK ROBERT THACKER, JR.</b> | ) | <b>Case No. 2:25-bk-50237-RRM</b> |
| <b>a/k/a JACK R. THACKER</b>    | ) | <b>Chapter 11 – Subchapter V</b>  |
| <b>a/k/a J.R. THACKER,</b>      | ) |                                   |
|                                 | ) |                                   |
| <b>Debtor.</b>                  | ) |                                   |

**MOTION FOR ENTRY OF AGREED ORDER AUTHORIZING M. AARON SPENCER,  
SUBCHAPTER V TRUSTEE TO DISBURSE FUNDS HELD IN SUBCHAPTER V  
TRUST ACCOUNT TO THE DEBTOR TO FUND CONFIRMED CHAPTER 11 PLAN**

Comes M. Aaron Spencer, the Subchapter V Trustee, (the “Trustee”) pursuant to E.D. LBR 9013-1, and moves the Court for entry of the Agreed Order Authorizing M. Aaron Spencer, Subchapter V Trustee to Disburse Funds Held in Subchapter V Trust Account to the Debtor to Fund Chapter 11 Plan, and for cause would show as follows:

1. Jack Robert Thacker, Jr. a/k/a Jack R. Thacker a/k/a J.R. Thacker (the “Debtor”) filed a voluntary Chapter 11 – Subchapter V bankruptcy case on March 6, 2025.
2. On March 6, 2025, M. Aaron Spencer was appointed the Subchapter V Trustee (the “Sub-V Trustee”) and currently serves in that capacity.
3. On March 28, 2025, the Court entered an Amended Agreed Order Granting Motion to Sell 4332 Pretoria Run Free and Clear of Liens and Interests [Doc. No. 55], whereby the balance of the sale proceeds from the closing of the real property commonly known as 4332 Pretoria Run (the “Real Property”) were to be held in an account by the Sub-V Trustee pending further order of the Court.
4. Additionally, the Sub-V Trustee is holding \$14,187.17 in the account that was a refund from Erie Insurance.

5. As of the filing of this Motion, the Sub-V Trustee is holding \$527,282.82 in the trustee account.

6. On July 29, 2025, the Court entered an Order Confirming Plan [Doc. No. 148] that provides for these funds to be disbursed to creditors pursuant to the plan.

WHEREFORE, the Sub-V Trustee prays that the Court enters the Agreed Order Authorizing M. Aaron Spencer, Subchapter V Trustee to Disburse Funds held in Subchapter V Trust Account to the Debtor to Fund Confirmed Chapter 11 Plan.

Respectfully submitted this 25th day of August, 2025.

WOOLF, McCLANE, BRIGHT,  
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/s/ M. Aaron Spencer

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*Subchapter V Trustee*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of August, 2025, a copy of the foregoing **Motion for Entry of Agreed Order Authorizing Adequate Protection in Favor of Pantheon Capital Advisors, Inc.** and proposed **Agreed Order Granting Adequate Protection in Favor of Pantheon Capital Advisors, Inc.** were filed electronically, notice of this filing will be sent by operation of the Court's electronic filing system to all parties as indicated below as receiving notice via electronic filing.

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/s/ M. Aaron Spencer  
M. Aaron Spencer